

1 FRANCIS M. GREGOREK (144785)

gregorek@whafh.com

2 BETSY C. MANIFOLD (182450)

manifold@whafh.com

3 PATRICK H. MORAN (270881)

moran@whafh.com

4 WOLF HALDENSTEIN ADLER

FREEMAN & HERZ LLP

5 750 B Street, Suite 2770

San Diego, California 92101

6 Telephone: 619/239-4599

Facsimile: 619/234-4599

7 JOSEPH J. SIPRUT (Admitted *Pro Hac Vice*)

jsiprut@siprut.com

SIPRUT PC

9 122 South Michigan Ave., Suite 1850

Chicago, IL 60603

10 Telephone: 312/588-1440

Facsimile: 312/427-1850

11 Attorneys for Plaintiff and the Putative Class

12 LAURENCE F. PULGRAM (CSB NO. 115163)

lpulgram@fenwick.com

13 TYLER G. NEWBY (CSB No. 205790)

tnewby@fenwick.com

FENWICK & WEST LLP

15 555 California Street, 12th Floor

San Francisco, California 94104

16 Telephone: (415) 875-2300

Facsimile: (415) 281-1350

17 Attorneys for Defendant

18 PANDORA MEDIA, INC.

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

22 TROY YUNCKER, individually and on behalf
of itself and all others similarly situated,

23 Plaintiff,

24 v.

25 PANDORA MEDIA, INC.,

26 Defendant.

27 Case No. CV 11-3113-JSW

28 **STIPULATION AND [PROPOSED]
ORDER RE: MODIFICATION OF
PAGE LIMIT**

1 The parties in the above-entitled action, by and through their respective attorneys, hereby
2 stipulate to the following:

3 WHEREAS, Plaintiff has filed a First Amended Class Action Complaint (“FAC”) that
4 alleges eleven (11) separate claims for relief against Defendant Pandora, Inc. (“Pandora”);

5 WHEREAS, Pandora’s response to the FAC is currently due on March 23, 2012;

6 WHEREAS, Pandora anticipates that it will file a Motion to Dismiss each of the claims
7 asserted in the FAC;

8 WHEREAS, this Court’s Civil Standings Orders specify that a brief in support of, in
9 opposition to, or in reply to a motion, except motions for summary judgment or claim
10 construction, shall not exceed 15 pages;

11 WHEREAS, Pandora’s Motion to Dismiss will require separate arguments as to the
12 sufficiency of each of the 11 claims asserted in the FAC several of which involve complex areas
13 of federal and state law;

14 WHEREAS, counsel for Pandora and counsel for Plaintiff have met and conferred, and
15 agree that the page limit for Pandora’s Motion to Dismiss, Plaintiff’s Opposition to Pandora’s
16 Motion, and Pandora’s Reply in support of its Motion should be increased;

17 IT IS SO AGREED that:

18 (1) Pandora shall be permitted to file a brief in support of its Motion to Dismiss the FAC
19 not to exceed thirty (30) pages;

20 (2) Plaintiffs shall be permitted to file an Opposition brief in response to Pandora’s
21 Motion to Dismiss not to exceed thirty (30) pages; and

22 (3) Pandora shall be permitted to file a Reply in support of its Motion to Dismiss not to
23 exceed 15 pages.

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO

1 Dated: March 8, 2012

2 FENWICK & WEST LLP

3 By: /s/ Tyler G. Newby
4 Tyler G. Newby

5 Attorneys for Defendant
6 PANDORA MEDIA, INC.

7 Dated: March 8, 2012

8 WOLF HALDENSTEIN ADLER FREEMAN
9 & HERZ LLP

10 By: /s/ Betsy Manifold
11 Betsy Manifold

12 Attorneys for Plaintiff
13 Troy Yuncker

14 **CERTIFICATION**

15 I, Tyler G. Newby, am the ECF User whose identification and password are being
16 used to file this **STIPULATION AND [PROPOSED] ORDER RE: MODIFICATION OF
PAGE LIMIT.** In compliance with General Order 45.X.B, I hereby attest that Betsy Manifold
17 has concurred in this filing.

18 DATED: March 8, 2012

19 By /s/ Tyler G. Newby
20 TYLER G. NEWBY (CSB No. 205790)
21 FENWICK & WEST LLP
22 555 California Street, 12th Floor
23 San Francisco, CA 94104
24 Ph: (415) 875-2300
25 Fax: (415) 281-1350
26 tnewby@fenwick.com

1 PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO
2

3 ORDERED.
4

5 SIGNED this 8th day of March, 2012
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jeffrey S. White
United States District Court Judge

FENWICK & WEST LLP
ATTORNEYS AT LAW
SAN FRANCISCO